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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOHNNY RIVERA,

Plaintiff,

v.

U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT,

Defendant.

Case No: 2:11-cv-01678-PMP-VCF

UNOPPOSED MOTION TO STAY PROCEEDINGS

PENDING COMPROMISE SETTLEMENT

Federal Defendant, U.S. Department of Housing and Urban Development (HUD), by and through its undersigned counsel, respectfully requests this Court enter a thirty-day stay of all proceedings and deadlines, including all motion and discovery deadlines, in order to allow the parties to finalize the terms of a settlement agreement and to execute and enter a Stipulation to Dismiss with Prejudice.

1 In support of this motion, the United States submits as follows:

2 1. Over the past several weeks the parties have been in negotiations, and have
3 recently agreed in principal to a compromise settlement which will resolve all outstanding claims
4 between the parties. Documents supporting this settlement are near completion.

5 2. Courts have broad discretion to stay proceedings for a limited time. *See Landis v.*
6 *N. Am. Co.*, 299 U.S. 248, 254-55 (1936); *see also Clinton, v. Jones*, 520 U.S. 681 (1997) (courts
7 have broad discretion in the management of cases, including the setting of cases for trial).

8 3. Granting a thirty-day stay of the proceedings and deadlines in this matter to allow
9 the parties to complete the necessary actions to conclude their settlement agreement is both in the
10 interest of the parties and is also in the interest of preserving judicial resources.

11 4. The instant motion is filed in good faith and not for the purposes of delay.

12 WHEREFORE, for the above reasons, the United States respectfully requests this Court
13 grant a thirty-day stay of the proceedings and deadlines in this matter.

14 Respectfully submitted this 26th day of September 2012.

15 DANIEL G. BOGDEN
16 United States Attorney

17 /s/ Justin Pingel
18 JUSTIN E. PINGEL
19 Assistant United States Attorney

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22 IT IS SO ORDERED.

23 
24 UNITED STATES DISTRICT JUDGE
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26 DATED: September 27, 2012
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PROOF OF SERVICE

I, Justin E. Pingel, AUSA, certify that the following individual was served with the **UNOPPOSED MOTION TO STAY PROCEEDINGS PENDING COMPROMISE SETTLEMENT** on this date by the below identified method of service:

Electronic Case Filing:

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DATED this 26th day of September 2012.

/s/ Justin Pingel
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